

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

EZRA SMITH, Plaintiff,

)

v.

)

Civil Action No.:

DEPUTY MONIQUE TRACEY, *et al.*,) 1:24-cv-05158-TWT

Defendants.

)

DEFENDANT TRACEY'S
MOTION FOR SUMMARY JUDGMENT

COMES NOW Defendant MONIQUE TRACEY in the above-styled action, and, pursuant to Rule 56 of the Federal Rules of Civil Procedure, files this Motion for Summary Judgment as to all claims set forth against her in Plaintiff's Complaint. In support of this Motion, Defendant relies upon her Answer and Defenses, all filings in this case and upon the following evidence filed in this matter.

- (1) Jail policy 5.22;
- (2) Booking Area Video (manually filed electronic material);
- (3) Holding Cell Video (manually filed electronic material);
- (4) Jackson Bodycam Video (manually filed electronic material);
- (5) Deposition of Plaintiff Ezra Smith with Exhibits;
- (6) Deposition of Defendant Monique Tracey with Exhibits;

(7) Deposition of Defendant Sanchez with Exhibits.

WHEREFORE, for the reasons set forth in the accompanying Brief, Defendant Tracey requests the Court to grant summary judgment in his favor. Should the Court dismiss fewer than all Defendants or claims, Defendant respectfully requests the Court to certify any dismissal as a final order under OCGA § 9-11-54(b).

WILLIAMS & WAYMIRE, LLC

/s/ Jason C. Waymire
JASON C. WAYMIRE
Georgia Bar No. 742602
Attorney for Defendant Tracey

Building 400, Suite A
4330 South Lee Street, NE
Buford, Georgia 30518
(678) 541-0790
(678) 541-0789
jason@wmwlaw.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing **MOTION, STATEMENT OF MATERIAL FACTS, SUPPORTING EXHIBITS** and Defendant's **BRIEF** upon all parties upon all parties electronically through the Court's CM/ECF system. Electronic exhibits are provided to all counsel through file sharing technology.

This 9 day of December 2025.

WILLIAMS & WAYMIRE, LLC

/s Jason Waymire

JASON WAYMIRE